

In the United States District
Court for the Southern District Court
of Illinois Seventh Circuit

United States of America
Plaintiff,

vs.

Donald V. Snowden
Defendant, Appellant

Case number : 19-40081-JPG

P. 1 of 2

Motion

* Complaint for ineffective counsel of CJA Counsel
Appointed, Jordan Campanella

Reason (A) According to Fed. R. App. Pro. 4(b)

Public Defender represents Appellant defender, my attorney asked
to withdraw, being he is not versed in appellate law.⁽¹⁾ If he can't
do appeals, he can't do trials.

Reason (B) Title 21 U.S.C 848 states, an attorney should
have the background, knowledge, and experience necessary to
represent defendant. Professional conduct for attorneys appointed
pursuant to ANY provision of the act shall conform to the
highest standards of professional conduct.

(1) How can my attorney know what to object to in trial
to save my appeal rights, and arguments for briefs for Appeal
after trial? He said that he is not versed with appellate law.

(2). Attorney doesn't know about Exclusionary Rule where
it states the "Law prohibits the use of illegally obtained evidence
in a criminal trial." Two case laws pertain to my suppression
hearing and one being, Mincey v. Arizona 437 U.S. 385 1978
and that's pertaining to due process violation with involuntary
confession from 8-2-2019 and the next is "challenging chain
of custody" State v. Hatcher 384 S.C. 372 (68) S.E. 2d 925

Motion
P. 2 of 2

Complaint for ineffective counsel of CJA
counsel, page 2.

Reason (C) Attorney advised me that since I'm in the Southern District of Illinois for the seventh circuit, that I would not have a chance at my suppression hearing, but I have case law that the appeals court already ruled to, and was won. Violations to the Case Laws mentioned in reason (B) brings civil law suits violating the constitution due process and the forth amendment.

Reason (D) Attorney can request to withdraw, and ask to appoint a trial counsel since Attorney is unable to continue at trial level. I ask these things in the interest of justice. Justice delayed, is Justice denied. Rule 52 Fed.R.Crim.Procedure plain error is what my appeal for after trial if I'm violated from the exclusionary Rule, and the court has malicious prosecution letting illegally obtained evidence in the criminal trial. My attorney's affidavit "clearly" states he is not "well-versed" in appellate law, therefore, if he doesn't represent me accordingly, All that's mentioned is grounds for appeal after trial. I have trial coming up, and I ask for Article I General Provisions Rule 3 Court of Appeals of the 7th circuit subsection (H)(1) misconduct, it seems this case has been for one side, the prosecution. I ask the courts to be Lawfull, not to discriminate and to see my attorney doesn't acknowledge, estoppel by Laches doctrine, when my case shows too many inconsistencies to go all the way to trial. It shows my constitutional rights are violated all the way through.

All is true and correct

respectfully signed
Donald V. Snowden

5. Defendant-Appellant filed a Notice of Appeal on December 12, 2019.

ECF No. 31.

6. Counsel for Defendant-Appellant is not well versed in appellate law
and does not wish to represent Defendant-Appellant on appeal.

7. Mr. Snowden is currently housed at the Williamson County Jail,
Marion, Illinois.

8. Counsel met with Mr. Snowden on December 16, 2019 and advised of
his wish to withdraw from said appeal. Mr. Snowden consented to the same.

9. A copy of this motion will be sent to him via U.S. mail.
10. Counsel has informed Assistant U.S. Attorney Amanda Robertson of
this request to withdraw from representation on appeal.

For the foregoing reasons, counsel respectfully requests an permission to
withdraw from representation of Defendant-Appellant on appeal in this matter and
to stay such appellate deadlines until said counsel is appointed.

4(b) FURTHER AFFIANT SAYETH NOT.

Respectfully submitted,

/s/ Jordan J. Campanella

Jordan J. Campanella

108 E. Main Street

DuQuoin, IL 62832

(618) 542-2323

ATTORNEY FOR DEFENDANT-
APPELLANT

title 21 U.S.C.
848

Attorney
should
have the
background,

and experience
necessary to
represent
defendant

Professional
conduct for

Attorneys
appointed
pursuant
to any

provisions
of the

act shall
conform to
the highest
standards
of

Professional
conduct.

Reason for
Appeal if
I lose trial.

This is a plain error for

review!

whereby a defendant must abide by the law while under post-release supervision or risk additional punishment (see below).

Appeals and Petitions for Writs of Certiorari:

If the defendant did not waive the right to appeal in a plea agreement, the defense may appeal both the conviction and the sentence imposed. The public defender will continue to represent the defendant, for free, during the appeal. There is a very short period during which the defense must state its intention to appeal ("notice" of appeal), so the subject should be discussed immediately after sentencing. See Fed. R. App. Pro. 4(b).

If the defendant does not win the appeal in the United States Court of Appeals for the Fourth Circuit, he or she can file a petition for writ of certiorari with the Supreme Court of the United States. Ordinarily, the public defender would continue to represent the defendant during the petition for certiorari and, if the writ is granted, during the briefing and oral argument in the Supreme Court.

Supervised Release and Violations:

Almost every federal offense carries with it a term of supervised release. Supervised release is like "probation;" a defendant must report to the Probation Office, submit to drug testing and abide by the law and standard conditions of supervised release.

There are, unfortunately, many ways to violate supervise release – not submitting monthly reports, having a dirty drug test, or being arrested for new criminal conduct.

When a Probation Officer files supervised release charges, they are contained in a charging document called a "Petition." If the defendant cannot afford an attorney, the public defender will be appointed for these revocation proceedings.

The defendant has much more limited rights in revocation proceedings than when facing substantive federal charges. For example, at a revocation hearing there is no jury. The government need only prove the charges by

United States of America
plaintiff,
vs.

In The United States District
Court for the Southern District
of Illinois

Seventh Circuit
Case Number: 19-40081-JPG

Donald V. Snowden
defendant-Appellant

Certificate of Proof of Service

I, Donald V. Snowden, filed a complaint on ineffective
counsel on CJA counsel appointed to represent me, Jordan Campanella.
I ask the court to give me a receipt upon receiving this
certificate of proof of service. All is true and correct,

Date Jan. 5th 2020

Respectfully,
Donald
V.
Snowden

404 N. Van Buren
Marion, IL 62959

Donald V. Snowden

404 N. Van Buren

Marion, IL 62959

CLERK

United States District Court Clerk

301 West Main St. MARION

Benton, IL 62812

Legal
Mail

Barn Swallow



62812-136201

LEGAL MAIL

Legal
Mail

RECEIVED

JAN 09 2020

CLERK U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
BENTON OFFICE

THIS ENVELOPE IS RECYCLABLE AND MADE WITH 30% POST CONSUMER CONTENT

